

DECLARATION OF LUCERO CHAVEZ

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2 1. I, Lucero Chavez, make this declaration based on my own personal
3 knowledge, and if called as a witness, I could and would testify to the following matters:

4 2. I am an attorney licensed to practice law in the State of California. I am a
5 senior attorney in the Immigrants' Rights Project at Public Counsel in Los Angeles,
6 California. I have been practicing immigration law for 7.5 years.

7 3. I represent 16-year-old L.P., a minor being held in the custody of the
8 United States government. L.P. was separated from her mother, J.P., after crossing into
9 the United States on or about May 17, 2018. L.P. is detained at Casa Phoenix, a
10 Southwest Key Program facility in Phoenix, Arizona. J.P. is detained at the Musick
11 Facility in Irvine, California.

12 4. On June 24, 2018, I met with L.P. at Casa Phoenix. The facility was
13 approximately ten minutes from the Phoenix International Airport and is a nondescript
14 building next to a walk-in clinic. At a glance, nothing indicates that the facility houses
15 children, let alone young immigrant children. A security guard accompanied me to
16 meet L.P. We came into an area with multiple makeshift meeting rooms along two
17 walls. The makeshift rooms were the size of a restaurant booth. Each fit two chairs
18 and a table and nothing else. I saw L.P. sitting next to a young woman wearing a
19 facility badge. L.P. carried a bag of chips and a water bottle with the shelter name into
20 the meeting room along with what appeared to be a wash towel.

21 5. We entered the meeting room and I began by introducing myself. L.P.
22 was alert but appeared as if she had been crying. I told her I was an attorney and that
23 we had met with her mother in the days prior. At the mention of her mother, L.P.
24 shrunk and tears welled in her eyes. She said she had spoken to her mother on Friday
25 for the first time since their separation, and she had been so sad because she had not
26 been able to speak with her for so long. L.P. used the wash towel she had brought into
27 the room to wipe her tears.
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1 6. L.P. told me that life was very hard in Guatemala and that her family
2 suffered very much. L.P. said she did not want to go back to Guatemala.

3 7. L.P. could only talk for short periods of time before tears came streaming
4 down her face. At one point, she put her head down on the table and cried. Every time
5 she remembered something from, or I asked about, the day she was taken from her
6 mother and how she felt afterward, she began to cry and used the wash towel to wipe
7 her face. During our meeting, which lasted about two hours, she folded and unfolded
8 the towel repeatedly.

9 8. L.P. said that whatever happens is God's will, she asks him for strength.
10 L.P. explained that she and her family are religious and that she participates in services
11 on Sundays at the shelter. She told me the only person she talks to regularly at the
12 shelter is a counselor who she sees once a week. She said the counselor told her not to
13 worry and gave her a bible.

14 9. L.P. explained that after approximately eleven days of travel from
15 Guatemala to the United States, she and her mother were stopped by officers in green
16 uniforms who took her and her mother to a station and placed them in a very cold
17 room.
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19 10. L.P. said she was very cold because her pants had gotten wet up to her
20 knees. She remembers being in the room for several days, and she was not given any
21 other clothes to wear.

22 11. During these days, L.P. saw many individuals and families come in and
23 out of the room where she was detained. She estimates that there were upwards of 50
24 people at a time, including children alone and women with their children. L.P. said the
25 children were always crying and that many mothers were separated from their children.
26 She remembered seeing two guards having to hold a mother on either side as her son
27 was forcibly taken from her by another guard. She heard a guard say, "If you're such a
28 good mother why would you bring your child here." She remembers being told by

1 officers “that if no one fights for their children, they stay here” [in the holding facility
2 at the border].”

3 12. L.P. said there were no beds in the room where they were kept. People
4 were given nylon-type gray blankets to cover themselves, and mothers with babies
5 were given small mattresses to sleep on. She said they were given soup to eat but it
6 was lukewarm and L.P. wouldn’t eat it. She also said they had to drink water from the
7 same tap used for the bathrooms. She recalled that the bathrooms, although in stalls,
8 were small and not separate from the rest of the room, giving no privacy. She also said
9 that mothers with babies were given formula but they had to use the tap water from the
10 bathrooms to make the bottles. She noted that there were no showers available. L.P.
11 explained that she and her mother were not allowed to make any phone calls and could
12 not tell if it was day or night at any given time because the room was windowless and
13 the lights were always on. L.P. said she was not told anything about if and when they
14 would be released.

15 13. L.P. told me that she was questioned by officers without her mother
16 present. L.P. explained she was given papers in English to sign but she did not know
17 what they were because she does not speak or read English. An officer told L.P. and
18 others that they would all be deported.

19 14. L.P. began to cry as she told me about the day she was taken from her
20 mother. She told me that when they took her mother away, she fainted and hit her face
21 and mouth. She remembers crying all the way to the shelter and being given medicine
22 at the shelter for her mouth injury. Her mouth was swollen for several days.

23 15. L.P. says she cried every day after she was separated from her mother; she
24 was depressed, hopeless, and confused. She said she had dreams that she saw her
25 mother’s shoes, dreams where she was back in Guatemala with her brothers but her
26 mother wasn’t there. L.P. says she prayed when she went to bed and when she woke
27 up that she may be able to see her mother. L.P. told me that she asked shelter staff
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1 where her mother was and they told her they did not know and that it was difficult to
2 find out. At one point, someone told her not to worry that her mother was in Yuma,
3 also in Arizona but no one could get a phone call for her. She asked me repeatedly
4 when she will be able to speak with her mom again and when they will be released.
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6 I declare under penalty of perjury under the laws of the United States that the
7 foregoing is true and correct.
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9 Executed on June 25, 2018, in Los Angeles, California.
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